

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

T. ROWE PRICE GROWTH STOCK FUND,  
INC., et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., J. MICHAEL  
PEARSON, HOWARD B. SCHILLER,  
ROBERT L. ROSIELLO, DEBORAH JORN,  
ARI S. KELLEN, and TANYA CARRO,

Defendants.

Civil Action No. 16-CV-5034-MAS-LHG

EQUITY TRUSTEES LIMITED AS  
RESPONSIBLE ENTITY FOR T. ROWE  
PRICE GLOBAL EQUITY FUND, et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., J. MICHAEL  
PEARSON, HOWARD B. SCHILLER,  
ROBERT L. ROSIELLO, DEBORAH JORN,  
ARI S. KELLEN, and TANYA CARRO,

Defendants.

Civil Action No. 16-CV-6127-MAS-LHG

PRINCIPAL FUNDS, INC. and PRINCIPAL  
VARIABLE CONTRACTS FUNDS, INC.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., J. MICHAEL  
PEARSON, HOWARD B. SCHILLER,  
ROBERT L. ROSIELLO, DEBORAH JORN,  
ARI S. KELLEN, and TANYA CARRO,

Defendants.

Civil Action No. 16-CV-6128-MAS-LHG

BLOOMBERGSEN PARTNERS FUND LP  
and BLOOMBERGSEN MASTER FUND LP,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., J. MICHAEL  
PEARSON, HOWARD B. SCHILLER,  
ROBERT L. ROSIELLO, DEBORAH JORN,  
ARI S. KELLEN, and TANYA CARRO,

Defendants.

Civil Action No. 16-CV-7212-MAS-LHG

**STIPULATION AND [PROPOSED] SCHEDULING ORDER**

This Stipulation is entered into between plaintiffs in the above-captioned actions (collectively, “Plaintiffs”) and Defendants Valeant Pharmaceuticals International, Inc., J. Michael Pearson, Howard B. Schiller, Robert L. Rosiello, Deborah Jorn, Ari S. Kellen, and Tanya Carro (collectively, “Defendants,” and together with Plaintiffs, the “Parties”).

WHEREAS, on August 15, 2016, September 26, 2016, September 27, 2016, and October 13, 2016 Plaintiffs filed complaints against Defendants alleging claims under the federal securities laws (the “Individual Action Complaints”);

WHEREAS, on June 24, 2016 Lead Plaintiff TIAA and Plaintiff City of Tucson in the related class action, *In re Valeant Pharmaceuticals International, Inc. Securities Litigation*, Civil Action No. 3:15-cv-7658-MAS-LHG, filed its consolidated putative class action complaint against the Defendants, also asserting federal securities claims (the “Class Action Complaint”); and

WHEREAS, Defendants filed motions to dismiss the Class Action Complaint on September 13, 2016; and

WHEREAS, on September 15, 2016, October 14, 2016, October 21, 2016, and November 18, 2016 the Court entered Orders staying Defendants’ time to respond to the Individual Action Complaints pending the Court’s decision on Defendants’ motions to dismiss the Class Action Complaint, and requiring the Parties to meet and confer and propose a schedule for further proceedings within fourteen (14) days after issuance of an order resolving Defendants’ motions to dismiss the Class Action Complaint (the “Stay Orders”); and

WHEREAS, the Court issued an order resolving Defendants’ motions to dismiss the Class Action Complaint on April 28, 2017; and

WHEREAS, the Parties met and conferred in accordance with the Court’s instructions in the Stay Orders:

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of the Parties, as follows:

1. Defendants will have until June 16, 2017 to answer, move to dismiss, or otherwise respond to the Individual Action Complaints;

2. In the event any of the Defendants move to dismiss any of the Individual Action Complaints, Plaintiffs will then have until July 28, 2017 to oppose any such motion to dismiss and the movants/Defendants will then have until August 25, 2017 to file any replies in support of their motion(s) to dismiss.

DATED: May 12, 2017

So Ordered this 17th day  
of May, 2017

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.

McCARTER & ENGLISH LLP

/s/ James E. Cecchi  
JAMES E. CECCHI

/s/ Richard Hernandez  
RICHARD HERNANDEZ

5 Becker Farm Road  
Roseland, NJ 07068  
Tel: (973) 994-1700  
Fax: (973) 994-1744  
jcecchi@carellabyrne.com

100 Mulberry Street  
Newark, NJ 07102  
Telephone: (973) 848-8615  
(973) 297-6615 (fax)

*Local Counsel for Plaintiffs*

*Local Counsel for Valeant Pharmaceuticals  
International, Inc., Robert L. Rosiello, and Ari  
S. Kellen*

BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP

SIMPSON THACHER & BARTLETT LLP  
PAUL C. CURNIN (admitted *pro hac vice*)  
425 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 455-2000  
Fax: (212) 455-2502

BLAIR A. NICHOLAS  
JONATHAN D. USLANER  
David Kaplan  
12481 High Bluff Drive, Suite 300  
San Diego, California 92130

*Counsel for Plaintiffs*

*Counsel for Valeant Pharmaceuticals  
International, Inc., Robert L. Rosiello, and Ari  
S. Kellen*

DEBEVOISE & PLIMPTON LLP

s/ Holly Wintermute

HOLLY WINTERMUTE

BRUCE E. YANNETT (admitted *pro hac*  
*vice*)

919 Third Avenue  
New York, NY 10022  
Telephone: (212) 909-6000  
Fax: (212) 909-6836

-and-

JONATHAN R. TUTTLE (admitted *pro hac*  
*vice*)

ADA FERNANDEZ JOHNSON (admitted  
*pro hac vice*)

801 Pennsylvania Ave., NW  
Washington, D.C. 20004  
Telephone: (202) 383-8036  
Fax: (202) 383-8118

*Counsel for Defendant J. Michael Pearson*

SCHULTE ROTH & ZABEL LLP

/s/ Cara David

CARA DAVID

BARRY A. BOHRER

MICHAEL L. YAEGER

919 Third Avenue  
New York, NY 10022  
(212) 756-2000  
Cara.david@srz.com  
*Counsel for Defendant Debora Jorn*

McCARTER & ENGLISH LLP

s/ Richard Hernandez

RICHARD HERNANDEZ

100 Mulberry Street  
Newark, NJ 07102  
Telephone: 973/848-8615  
Fax: 973/297-6615

*Local counsel for Tanya Carro*

COOLEY LLP

WILLIAM J SCHWARTZ

LAURA GROSSFIELD BIRGER

1114 Avenue of the Americas  
New York, New York 10036  
Telephone: (212) 479-6000  
Fax: (212) 479-6275

*Counsel for Tanya Carro*

WINSTON & STRAWN LLP

/s/ James S. Richter

JAMES S. RICHTER

MELISSA STEEDLE BOGAD  
One Riverfront Plaza, Suite 730  
Newark, New Jersey 07102  
Telephone: (973) 848-7645  
Facsimile: (973) 848-7650

-and-

ROBERT Y. SPERLING

JOSEPH L. MOTTO

35 West Wacker Drive  
Chicago, Illinois 60601  
Telephone: (312) 558-5600

*Counsel for Howard B. Schiller*